

# **EXHIBIT 116**

**In the Matter Of:**

*HENRY v*

*BROWN UNIVERSITY*

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*BRIDGET TERRY LONG, PH.D.*

*October 23, 2024*

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1 Q. And I guess, Dr. Long, this will be the  
2 first test of having you look at a hard copy.

3 MR. NORMAND: Tab 26 is Dr. Hill's report.

4 Bryan, I have in mind Paragraph 14 of that  
5 report.

6 A. Yes, I see Paragraph 14.

7 Q. Do you see the language Dr. Hill uses in  
8 that Paragraph 14, "I therefore conclude that  
9 there are no anticompetitive effects that would  
10 outweigh any procompetitive benefits of the  
11 568 Group, as identified by Dr. Long in her  
12 report."

13 Do you see that language?

14 A. I do see that language.

15 Q. In your report, was part of your  
16 assignment to assess any procompetitive benefits  
17 of the 568 Group?

18 A. I -- as part of doing my report, I was not  
19 posed the question specifically about benefits but  
20 to evaluate what the 568 Group was, what it did,  
21 and to outline the impact of the group.

22 Q. You don't use the word "procompetitive" in  
23 your report. Is that right?

24 A. I would have to look back. I may have

1 used it. It is not typical of how we think about  
2 things in higher education, so it's not a common  
3 term that I would use.

4 Q. Do you have an understanding of what  
5 Dr. Hill means by "procompetitive benefits"?

6 A. In general, yes. The questions of the  
7 benefits -- essential benefits of the 568 Group.  
8 Yes.

9 Q. Do you have in your mind a distinction  
10 between the benefits of the 568 Group, on the one  
11 hand, and the procompetitive benefits of the  
12 568 Group, on the other hand?

13 A. So as an economist, I'm aware of what it  
14 means to be competitive.

15 As a expert in higher education, which is  
16 a distinct industry that thinks about these things  
17 perhaps differently than the average for-profit  
18 firm, I did very much focus on the question, if  
19 the goal is to increase access and equity for  
20 low-income students, did the 568 Group benefit  
21 students and families in the system overall. So  
22 that was really the focus of my report.

23 Q. Do you have any understanding as to  
24 whether a procompetitive benefit is a term of art

1 under the federal antitrust laws?

2 A. That sounds like a legal question, and I'm  
3 not here to provide legal opinions.

4 Q. Is, to your understanding, "procompetitive  
5 benefit" a term of art in economics?

6 A. As I said, I'm familiar with it more  
7 generally with relation to competing for students.  
8 I'm aware of how institutions might use different  
9 packaging.

10 But with relation to this case and the  
11 568 Group being focused on need-based aid and  
12 need-based analysis, a family's ability to pay,  
13 competition really sits with things like  
14 merit-based aid, which is a different part of an  
15 institution's considerations for, again,  
16 packaging, you know, the combination of loans and  
17 grants and work-study, which, again, was separate  
18 from the focus of the 568 Group.

19 Q. Do you have any understanding as to  
20 whether the conduct that the plaintiffs are  
21 challenging in this case is the 568 Group, on the  
22 one hand, or the overarching agreement among the  
23 defendants, on the other hand?

24 A. My understanding is that there are certain

1 And then looking at their actions, at what  
2 was developed through and recommended through the  
3 568 Group, what individual institutions did,  
4 whether or not they took those recommendations,  
5 whether those recommendations over time advanced  
6 ways to better estimate what a family's ability to  
7 pay was, and then the overarching what happened  
8 over time in terms of net price, in terms of  
9 institutional grant aid for the defendants, and  
10 whether or not they made progress towards the  
11 stated goal of the 568 Group.

12 Q. Did you analyze whether the 568 Group  
13 benefited low-income students over and above the  
14 benefits that those students would have received  
15 from policies that defendants would have adopted  
16 even if they weren't members of the 568 Group?

17 A. So that takes a number of hypotheticals.  
18 Much of my analysis, much of my discussion  
19 considers defendants and their peers. So this is  
20 including institutions that are not part of the  
21 568 Group and what happened more generally across  
22 those institutions, again, as this was part of a  
23 larger movement of many institutions.

24 And the 568 Group in its work, in its

1 efforts to increase equity and fairness in  
2 estimating a family's ability to pay, was in  
3 conversation with other industry groups that were  
4 also considering these issues.

5 So my report covers not just the  
6 defendants. It also looks at their peers, also  
7 looks at what's going on in the industry, and  
8 noted that there was many efforts.

9 The 568 Group had a specific purpose or a  
10 specific set of institutions. It made progress on  
11 trying to understand how to meet families where  
12 they are and address their affordability needs.

13 And I think you're starting to get into  
14 questions of larger hypotheticals. So again, it's  
15 important to note that their peer institutions,  
16 that many other institutions in higher education  
17 were concerned about similar things and were part  
18 of much broader efforts.

19 Q. In your analysis, have you tried to  
20 disaggregate the impact of the 568 Group on  
21 low-income students from other factors?

22 A. If you would please elaborate on what you  
23 mean.

24 Q. I take it from your report and your

1 but there are many different efforts and factors  
2 going on during this period.

3 And then I can evaluate did the 568 Group  
4 follow the goal of trying to increase equity,  
5 fairness, and accuracy in estimating whether or  
6 not families can afford to pay for college and how  
7 much.

8 Q. Did you conduct any empirical analyses to  
9 evaluate whether the 568 Group benefited  
10 low-income students?

11 A. So I, again, looked at the trend of the  
12 defendants, the defendants and their peers, as  
13 shown in several of the figures of my report. And  
14 I contextualized that with the work that was done  
15 within the 568 Group to give a sense of the impact  
16 of whether they made progress at increasing access  
17 to low-income students.

18 Q. And do you have an opinion as to the  
19 extent to which that progress is attributable to  
20 the 568 Group as opposed to other factors?

21 A. So because there are many different steps  
22 in the process, this isn't like what economists  
23 like to do to completely isolate the impact of one  
24 policy.



1 But what we can see are the improvements  
2 that were made over time to better account for the  
3 financial circumstances of low-income students and  
4 be responsive to their needs so we can see those  
5 changes and see that they are for the benefit and,  
6 again, are improving equity and fairness in how we  
7 try to measure a family's ability to pay.

8 And that work is part of larger systems of  
9 efforts that started before the 568 Group and  
10 continue to this day to help institutions to make  
11 progress in terms of supporting low-income  
12 students and increasing financial aid to them.

13 Q. Do you have an opinion on whether  
14 defendants could have achieved this progress for  
15 low-income students by spending more on  
16 institutional financial aid, by offering larger  
17 price discounts?

18 A. So the question that was before me was  
19 about the 568 Group, which was solving a problem,  
20 which was a very important problem in terms of  
21 trying to address the needs of low-income  
22 students, if you believe that is essential, that  
23 if you're going to meet the needs of students,  
24 that you do what you can to improve your

1 Q. Do you know whether by that measure any of  
2 the defendants improved their social mobility over  
3 the last 25 years?

4 A. So my analysis focused on the period of  
5 time they were part of the 568 Group where I could  
6 observe what financial aid students received,  
7 low-income students received, and their net  
8 prices.

9 But the longer-term outcomes in terms of  
10 what students' longer-term outcomes in terms of  
11 their income distribution is not part of my  
12 analysis.

13 So we can cite other work from earlier  
14 periods of time showing that low-income students  
15 who go to highly resourced, strong institutions  
16 are more likely to end up in higher income  
17 brackets after graduation.

18 Q. Did you analyze in this case whether the  
19 overarching agreement among the defendants  
20 increased socioeconomic diversity at the  
21 defendants' schools?

22 A. So my first priority was to respond to the  
23 claims put forth by Dr. Singer about what the  
24 568 Group was, what the CM guidelines were, and

1 how colleges and universities responded to that  
2 information.

3 So that was my first priority, given that  
4 was what was highlighted as challenged conduct.

5 The other piece is about the percentage of  
6 students from different backgrounds. Again, I  
7 speak about some of the indicators that we see but  
8 also noting that eventual outcome is reliant on  
9 things far beyond the work of the 568 Group.

10 Q. Is it your understanding since the early  
11 2000s the schools in the 568 Group have increased  
12 their socioeconomic diversity?

13 A. In general, my understanding is yes, the  
14 defendants, along with many of their peers, have  
15 increased socioeconomic diversity within their  
16 student body.

17 Q. Do you have an opinion as to whether the  
18 568 schools would have increased their  
19 socioeconomic diversity even if there had not been  
20 the 568 Group?

21 A. So given the fact that these principles  
22 and values had been expressed before the 568 Group  
23 formed -- in fact, the early work of the 568 Group  
24 drew upon what the defendants and their peers were

1 already doing -- my sense is that directionally  
2 the institutions with these commitments would have  
3 moved, again, in the direction of increasing the  
4 socioeconomic diversity.

5 So it's unclear, again, given the function  
6 of the group as really a learning forum about  
7 really dicey issues with need-based aid, whether  
8 certain decisions or conclusions or evidence would  
9 have been brought to bear about how to improve  
10 equity and lack of low-income students.

11 My fear is without expertise, strong  
12 analysis, discussions among experts, without that  
13 that institutions may have felt less confident  
14 about their need-analysis systems. They may have  
15 been more cautious.

16 And the thing that I think we have to be  
17 very cautious about, this is students' lives. We  
18 don't want to experiment in ways that might very  
19 negatively impact students and whether or not they  
20 can afford to go to peer institutions.

21 So having a group that focused energy on  
22 methods to improve equity and access, my sense is  
23 that certainly supported these efforts to a much  
24 greater degree than if the group had not existed

1 at all, although, again, I think institutions were  
2 working to continue an increasing access for  
3 low-income students with things like increased  
4 outreach and holistic review and some of the other  
5 things in my report.

6 Q. Did you analyze in your report whether  
7 four-year colleges that were not in the 568 Group  
8 have increased their socioeconomic diversity to a  
9 greater extent than the schools in the 568 Group?

10 A. So in the report, I did look at the  
11 defendants and their peers, also recognizing that  
12 some of the institutions in the 568 Group decided  
13 to leave or to return, and looking at that group  
14 in general being the commitment to improvement in  
15 supporting low-income students.

16 But I did not do deep analysis in one  
17 institution relative to another institution. So  
18 again, we're dealing with a diverse set of  
19 institutions with different resources, context,  
20 and so every institution has its own decisions  
21 that it needs to make.

22 Q. Did you try to quantify, for purposes of  
23 your report, the extent to which the 568 Group  
24 itself has helped to increase socioeconomic

1 diversity at those schools?

2 A. So again, in my analysis I provide very  
3 specific analysis on their behavior with regard to  
4 the 568 Group and how that may have impacted  
5 decisions. And I do look at the overall picture,  
6 as I provided in several of my figures.

7 But again, the focus of my analysis was on  
8 the conduct that was called into question and the  
9 specifics of how the 568 Group functions.

10 Q. Have you reviewed Professor Rothstein's  
11 report in this case?

12 A. Yes, I have reviewed that report.

13 Q. And do you have any opinions on his  
14 analyses?

15 A. So he's asking a slightly different  
16 question in that he's comparing what happened with  
17 the defendants relative to other schools.

18 I first would say, again, we're looking to  
19 see whether or not they are making progress in  
20 terms of supporting low-income students, realizing  
21 also that financial aid is just one of many  
22 investments that colleges and universities are  
23 making in their students, with Dr. Rothstein's  
24 work.

1       tremendously depending on what part of the country  
2       you live in.

3               In some parts of the country it is an  
4       important part of a family's savings. In others,  
5       the home equity is less something that families  
6       can tap into.

7               So there was a lot of discussion and lack  
8       of clarity. And as you can imagine, as  
9       institutions having varied policies, this was  
10      confusing for families.

11              Q. When you say in Paragraph 116 of your  
12      report that the guidelines, many of which resulted  
13      in lower EFCs for many students, have you tried to  
14      quantify the percentage of students who had lower  
15      EFCs as a result of the guidelines?

16              A. I have not tried to quantify the  
17      percentage of students.

18              My focus was on responding to claims by  
19      the plaintiffs' expert that the changes in  
20      guidelines only went in one direction to the  
21      disadvantage of students. And that's not what I  
22      found.

23              Q. Apart from home equity, have you reached  
24      any conclusions as to other guidelines that

1 right portion of this up on the screen, for those  
2 who are needing the screen version.

3 Q. Would you look at the top of page 13. Do  
4 you see that language in the bullet point,  
5 Dr. Long?

6 A. I do.

7 Q. And in that sentence, what do you mean  
8 when you say "access"?

9 A. Oh, okay. Sorry. In that paragraph or  
10 that bullet point, by "access" I mean increasing  
11 the ability of students to be able to afford their  
12 institution.

13 Q. Is it fair to say that access is a  
14 function of, among other variables, the cost of  
15 education?

16 A. It is fair to say access is a function of  
17 whether or not the students can meet the financial  
18 costs they've been presented with. Yes.

19 Q. Your view is that need-based financial aid  
20 improves access to education?

21 A. My view is need-based financial aid  
22 improves access for low-income students by  
23 increasing their ability to afford to attend  
24 college.



1 Q. If you'd look at page 86 of your report.  
2 Looking at the header, "The 568 Group Was Formed  
3 to Improve Equity and Transparency in Need  
4 Analysis." Do you see that?

5 A. I do see that.

6 Q. Do you have an opinion on whether the  
7 568 Group was formed to improve access to  
8 education?

9 A. My opinion is that the 568 Group took on  
10 one piece of a larger puzzle that is necessary in  
11 order to improve access to higher education for  
12 low-income students.

13 Q. Do you have an opinion on whether the  
14 568 Group improved access to education at the 568  
15 schools?

16 A. So looking at the nuts and bolts of what  
17 the 568 Group did, what the CM guidelines  
18 recommended, and the behavior of institutions, I  
19 do see examples where the defendants were doing  
20 things to better meet the needs of low-income  
21 students.

22 And in the aggregate, I see that they are  
23 spending more on institutional grant aid, some of  
24 them going more toward no-loan programs or

1 reducing the amount of loans that low-income  
2 students take on.

3 Q. Do you have an opinion on whether the 568  
4 schools would have better improved access to  
5 education if they had not created the 568 Group?

6 A. So the question of whether or not they  
7 would have improved access more without the  
8 568 Group? That is the question?

9 Q. That's right.

10 A. So in considering the alternative, as I  
11 said, these are institutions that have long held  
12 these values and principles before the creation of  
13 the 568 Group.

14 If the 568 Group had not existed, they  
15 would have directionally, my guess is, continued  
16 to move in the direction of increasing assets but  
17 without the benefit of careful thought about how  
18 to estimate the needs of low-income students and  
19 to better offer -- make them better able to  
20 address their need to pay for college, their  
21 affordability issues.

22 So to the degree that the defendants  
23 without the 568 Group did not improve their  
24 understanding and calculations to meet students

1 where they are given the resources that they would  
2 need in order to attend college, that would have  
3 impacted their ability to increase access.

4 The question, though, is there issues that  
5 the defendants and their peers and many other  
6 institutions were concerned about? Without the  
7 568 Group, it's unclear whether or not there would  
8 have been improvement to the same degree on  
9 elements of how we understand the needs of  
10 low-income students.

11 Q. Do you have an opinion on whether Harvard  
12 and Princeton did a better job of increasing  
13 access than the 568 schools?

14 MS. KIRKPATRICK: Objection to form.

15 A. So I am not making judgment calls about  
16 who did it better. One thing when I am teaching  
17 these concepts with my students is to be careful  
18 about making judgments when there are differences  
19 in the underlying resources of institutions.

20 For example, we know that community  
21 colleges are very committed to the goal of  
22 increasing access for low-income students. So we  
23 don't judge them negatively because they have  
24 fewer resources to be able to meet the needs of

1 displays defendants' average net price and how it  
2 decreased over time for federally aided students  
3 in low-income brackets.

4 So you can see over time the average cost  
5 of attendance increased, but for students in the  
6 lower-income bracket the average net price  
7 decreased over time.

8 Q. And for Figures 3, 4, and 5, do you have  
9 any opinion on what those numbers would look like  
10 if the 568 Group had not been formed?

11 A. So these figures using the IPEDS data are  
12 giving you a sense of the trends over time.

13 One thing I would note is the IPEDS data  
14 did not break down the financial aid information  
15 into specific categories in the ways that are  
16 reflected in tables until the 2008 year. So we're  
17 not seeing years previous to that.

18 Would these trends still be relevant  
19 without the 568 Group? Given the fact that these  
20 institutions of defendants and many of their peers  
21 have long emphasized the values of access for  
22 low-income students and their goals to improve  
23 need analysis to better meet the needs of  
24 low-income students, my expectation is that the

1 defendants would have increased over time their  
2 institutional aid.

3 They would have -- we would see reductions  
4 in the net price for low-income students, but it  
5 is unclear if it would have been at the same pace.

6 It is unclear without the 568 Group if  
7 they would have made as much progress on  
8 understanding how to account for different  
9 elements of the family's financial circumstances.

10 And it's unclear without having such a  
11 grounded process, again tapping into experts and  
12 data to do the need analysis, if we would have  
13 seen the same dramatic trends or if they would  
14 have been somehow lessened.

15 But again, it is hard to know the  
16 specifics of what would have happened given,  
17 again, these were values and goals stated by the  
18 defendants and their peers and there were other  
19 industry groups that were also noting the  
20 importance of need-based aid and trying to improve  
21 the calculations of a family's ability to pay.

22 Q. Have you analyzed whether the 568 schools  
23 would have made more progress, to use your word,  
24 if they had not formed the 568 Group?

1 A. My analysis focuses on the progress that  
2 they made and the role of the 568 Group in helping  
3 to address a problem that many in the industry  
4 noted and then the progress that they made.

5 Q. You've heard the term "horizontal equity"  
6 and used it in your report?

7 A. Yes, I have.

8 Q. And "horizontal equity" refers to treating  
9 families in similar financial circumstances  
10 similarly. Is that right?

11 A. Yes, generally speaking so.

12 Q. And you've heard the term "vertical  
13 equity" and have used that in your report. Is  
14 that right?

15 A. Yes. That is correct.

16 Q. And that refers to treating families in  
17 different financial circumstances differently.  
18 Correct?

19 A. That refers to giving more aid to families  
20 that have fewer financial resources.

21 Q. Is it your opinion that the 568 Group led  
22 to greater horizontal equity at the 568 schools?

23 A. It is my opinion that the 568 Group did  
24 advance horizontal equity among the defendants but

1 also their peer institutions and many other  
2 institutions that they shared the lessons that  
3 they learned and the recommendations that they  
4 made with the broader industry.

5 Q. Is it your opinion that the 568 Group  
6 helped to cause non-568 Group schools to improve  
7 their horizontal equity?

8 A. It is my opinion.

9 I can give one example where the work by  
10 the 568 Group to better understand how to do  
11 cost-of-living adjustments, which is a complicated  
12 and dicey topic, that was then shared more  
13 broadly, did help institutions to better be able  
14 to account for differences, as I've shared before,  
15 the students in Manhattan, New York, versus  
16 Manhattan, Kansas.

17 Q. Is it your opinion that the 568 Group led  
18 to greater vertical equity in the 568 schools?

19 A. It is my opinion that the goal of the  
20 568 Group was to improve vertical equity. And by  
21 doing careful analysis and discussion of how to  
22 treat different elements, that it likely also  
23 increased vertical equity.

24 Q. Have you tried to quantify the extent to

1 which the 568 Group increased vertical equity?

2 A. So my analysis looks at whether or not the  
3 group has implemented the stated goals that it had  
4 to improve both horizontal and vertical equity and  
5 whether or not the behavior -- the recommendations  
6 that came out of the 568 Group and the behavior of  
7 the institutions reflect them actually living up  
8 to that goal. And that is what I find.

9 Q. Is it your opinion that the 568 Group  
10 reduced the variation in needs estimates that the  
11 568 schools provided to their students?

12 A. So the question of variation in comparison  
13 to other students is to improve equity. It's not  
14 that we're trying to reduce the variation across  
15 students. But any one student, given their  
16 financial circumstances, is hopefully now getting  
17 a more transparent, equitable, and fair estimate  
18 of their ability to pay.

19 So unlike what we see when we looked  
20 earlier at Figure 7, you don't have schools  
21 estimating vastly different abilities to pay and  
22 instead see concerted efforts, thoughtfulness,  
23 commitments to equity, so that a family is  
24 understanding in a much more transparent way how



1 in need analysis.

2 Q. And in this context, what do you mean by  
3 "fairness"? I don't mean to be dense. But in  
4 this context, what does that mean?

5 A. So the concept of fairness goes back to  
6 the concept of horizontal and vertical equity.

7 Fairness, if we are trying to meet the  
8 needs of low-income students and increase their  
9 access, means that we devote more financial aid to  
10 students who have fewer resources.

11 Fairness also means that two students may  
12 appear to have very different economic  
13 circumstances; when we look at the details realize  
14 they have the same ability to pay. We would  
15 calculate a similar financial need based on the  
16 data sets the schools have.

17 Q. And is it your opinion that the 568 Group  
18 increased fairness and equity across the 568  
19 schools?

20 A. It is my opinion that the 568 Group had  
21 the goal of increasing fairness and equity and  
22 took steps through their discussions and research  
23 to put forth a series of recommendations that in  
24 fact did a better job at trying to account for a

1 family's ability to pay.

2 And then the defendants and others made  
3 individual institutional decisions about whether  
4 or not to accept those recommendations or to use  
5 different policies, but again, with the overall  
6 goal of priority of need-based aid and trying to  
7 increase access for low-income students.

8 Q. Is it your opinion that the 568 guidelines  
9 were a factor in increasing fairness and equity  
10 across the 568 schools?

11 A. It is my opinion that the CM guidelines  
12 that came out of the 568 Group provided valuable  
13 information and, as they changed over time, really  
14 reflected learning what was going on among these  
15 institutions and their peers and others about how  
16 best to estimate a family's ability to pay.

17 So with that goal in mind, the 568 did  
18 help advance that goal for the defendants and for  
19 other schools.

20 So again, the defendants could look at the  
21 recommendations. And as we see in the record,  
22 there were lots of different opinions. There was  
23 lots of discussions.

24 Many of these issues, it's not obvious

1 costs.

2 And on the other side, if the willingness  
3 to pay results in us giving money to families who  
4 can afford to pay for the full price, then the  
5 concern is that that money is being given in a way  
6 that is not advancing the public mission.

7 Q. Would you agree with Dr. Baum's statement  
8 in her primer that equity is the primary  
9 motivation for need analysis?

10 A. I would agree, just generally speaking,  
11 that, yes, need analysis is trying to get to fair,  
12 equitable estimates of a family's ability to pay  
13 based solely on their financial circumstances.

14 Q. Would you agree, as Dr. Baum says in the  
15 primer, that there is no definitive way to measure  
16 the equity of any particular policy?

17 A. I am not aware of that statement and would  
18 need to see --

19 Q. For any of these, Dr. Long, I can show you  
20 the language. So this is Tab 6, which I guess  
21 will be Exhibit 4.

22 (Exhibit 4 marked for identification)

23 A. I have this document.

24 Is there a place I should go?

1 bit. That's Tab 6 or Exhibit 4.

2 A. Okay.

3 Q. I'm looking at the first full paragraph on  
4 page 29, beginning "Profit-making firms."

5 A. Yes, I see that.

6 Q. Would you agree that not-for-profit  
7 colleges and universities must pay considerable  
8 attention to managing both revenues and costs?

9 A. I do agree that nonprofit colleges do need  
10 to pay attention to their resources.

11 Q. Looking at page 49 of the primer. And I'm  
12 looking at the first full paragraph on page 49.  
13 If you could read that, Dr. Long, and let me know.

14 A. Okay. I've read that first paragraph.

15 Q. Thank you. Dr. Baum says in that  
16 paragraph, "There is no absolute standard against  
17 which a need analysis methodology can be measured,  
18 and many of the judgments involved in constructing  
19 a methodology are subjective." Do you see that  
20 language?

21 A. I do see that language.

22 Q. Do you agree with that?

23 A. I do agree that designing a need analysis  
24 methodology is a complicated thing with certain

1 elements being subjective, others being formed  
2 with evidence.

3 But it is, again, something that requires  
4 a lot of thoughtfulness and debate and discussion,  
5 which is what we see from the documents in this  
6 case.

7 Q. Do you think there's any absolute standard  
8 against which to measure a need analysis  
9 methodology?

10 A. So as we discussed before, trying to  
11 evaluate a need analysis methodology by itself in  
12 a vacuum is difficult to think of how you would  
13 approach that.

14 But even as Dr. Baum says in the final  
15 sentence, you can examine aspects of practices and  
16 potential modifications. You can do the  
17 comparative statics that we discuss to see whether  
18 or not a methodology is moving in a direction that  
19 advances equity, advances efficiency, following  
20 these economic principles.

21 Q. Dr. Baum says later in the primer, "Even  
22 if we could agree on a clear ranking of aid  
23 applicants based on financial capacity, the  
24 precise amount of the expected contributions would